

**IN THE CIRCUIT COURT FOR MONTGOMERY COUNTY, ALABAMA**

**CUBIE EILAND and QUALITY  
ASSURANCE TESTING  
LABORATORIES, INC.,**

Plaintiffs,

V.

CITIBANK USA, N.A. and  
QUIK PAWN SHOPE,

**Defendants.**

CIVIL ACTION NO.: CV-2007-279

**NOTICE OF FILING NOTICE OF REMOVAL**

Pursuant to 28 U.S.C. § 1446(d), Defendant, Citibank (South Dakota), N.A. as successor in interest to Citibank USA National Association identified in the Complaint as Citibank USA, N.A. (herein referred to as “Defendant” or “the Bank”), hereby gives notice to the Circuit Court of Montgomery County, Alabama, and Donald G. Madison, as Attorney for the Plaintiff, that Defendant has filed a Notice of Removal with the United States District Court for the Middle District of Alabama, Northern Division, and this case has been removed to that Court. Attached is a copy of this Notice of Removal filed with the United States District Court for the Middle District of Alabama, Northern Division.

This the 16th day of March, 2007.

Respectfully submitted,



---

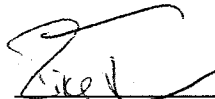
RIK S. TOZZI Bar No. 7144-Z48R  
Attorney for Defendant Citibank (South  
Dakota), N.A. as successor in interest to  
Citibank USA National Association identified  
in the Complaint as Citibank USA, N.A.  
Starnes & Atchison LLP  
Seventh Floor, 100 Brookwood Place  
Post Office Box 598512  
Birmingham, Alabama 35259-8512  
Telephone: (205) 868-6000  
Facsimile: (205) 868-6099

**CERTIFICATE OF SERVICE**

I hereby certify that on March 16, 2007, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the following:

A true and correct copy of this pleading has been mailed, by United States Mail, first class, postage prepaid, to the following non-CM/ECF participants on this :

Donald G. Madison  
418 Scott Street  
Montgomery, AL 36104  
e-mail: [dgmadison@bellsouth.net](mailto:dgmadison@bellsouth.net)



---

RIK S. TOZZI (Bar No. 7144-Z48R)  
Attorney for Defendant Citibank (South  
Dakota), N.A. as successor in interest to  
Citibank USA National Association identified  
in the Complaint as Citibank USA, N.A.  
Starnes & Atchison LLP  
Seventh Floor, 100 Brookwood Place  
Post Office Box 598512  
Birmingham, Alabama 35259-8512  
Telephone: (205) 868-6000  
Facsimile: (205) 868-6099  
E-mail: [rst@starneslaw.com](mailto:rst@starneslaw.com)